

8. Denied.

9. Denied.

10. Defendants admit that Recontrust is an affiliate of Bank of America, and that both Recontrust and Samuel I. White, P.C. are trustees. Defendants deny the remaining allegations.

11. Defendants admit that Recontrust is not a resident of Virginia, and deny the remaining allegations.

12. Denied.

13. Denied (as to both paragraphs numbered 13).

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

As to the paragraphs listed under "Counterclaims," said Defendants respond as follows:

1. Denied.

2. Denied.

3. Denied.

4. Denied.

5. Denied.

6. Denied.

7. Denied.
8. Denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. Denied.
14. Denied.
15. Denied.
16. Denied.
17. Denied.
18. Denied.
19. Denied.
20. Denied.
21. Defendants reallege paragraphs 1-20.
22. Denied.
23. Denied.
24. Denied.
25. Denied.
26. Denied.
27. Denied.
28. Denied.
29. Denied.

30. Denied.

31. Denied.

Defendants further assert the following defenses:

First Defense

Plaintiff fails to state a claim upon which relief can be granted.

Second Defense

If any actions of Defendants turn out to be improper, those actions were not intentional and resulted from a bona fide error notwithstanding the maintenance of procedures reasonably adapted to avoid such error.

Third Defense

Plaintiffs' claims are barred by estoppel.

Fourth Defense

Plaintiffs' claims are barred by waiver.

Fifth Defense

Plaintiffs' claims are barred by the doctrine of unjust enrichment.

Sixth Defense

Plaintiffs' claims are barred by unclean hands.

Seventh Defense

Plaintiffs' claims are barred by the parol evidence rule.

Eighth Defense

Plaintiffs' claims are preempted by the National Bank Act and other federal law.

Wherefore, Defendants pray that the Complaint be dismissed, that they be granted reasonable attorney' fees and costs and that the Court grant such other relief as demanded by the interest of justice.

/s/ Jenelle M. Dennis

Jenelle M. Dennis (VA Bar No. 66569)

BALLARD SPAHR LLP

4800 Montgomery Lane, 7th Floor

Bethesda, MD 20814-3401

Telephone (301) 664-6200

Facsimile: (301) 664-6299

Email: dennisj@ballardspahr.com

Attorney for Defendants Bank of America, NA,
Countrywide Home Loans, Inc., BAC Home Loans
Servicing LP, Recontrust Company, NA and
Mortgage Electronic Registration Systems, Inc.

Dated: August 31, 2010

CERTIFICATE OF SERVICE

I certify that I have this 31st day of August 2010, caused the foregoing Answer to be served by first-class mail, postage prepaid, upon:

Asad Sammi Niyaz
20278 Glenrobin Terrace
Ashburn, VA 20147

Ronald Guillot
SAMUEL I. WHITE, P.C.
5040 Corporate Woods Dr
Suite 120
Virginia Beach, VA 23462

/s/ Jenelle M. Dennis

Jenelle M. Dennis (VA Bar No. 66569)
BALLARD SPAHR LLP
4800 Montgomery Lane, 7th Floor
Bethesda, MD 20814-3401
Telephone (301) 664-6200
Facsimile: (301) 664-6299
Email: dennisj@ballardspahr.com

Attorneys for Defendants Bank of America, NA,
Countrywide Home Loans, Inc., BAC Home Loans
Servicing LP, Recontrust Company, NA and
Mortgage Electronic Registration Systems, Inc.